UNITED	STATES	DISTRIC	T COU	JRT
SOUTHE	RN DIST	RICT OF	NEW	YORK

RINAT HAFIZOV,

Civil Action No.: 1:22-cv-08853 (JPC) (RWL)

Plaintiff,

BDO USA, LLP, JANET BERNIER and MATTHEW DYMENT, in their individual and professional capacities,

v.

Defendants.

DECLARATION OF DAVID E. GOTTLIEB IN SUPPORT OF PLAINTIFF'S REPLY MEMORANDUM OF LAW IN FURTHER SUPPORT OF HIS MOTION TO COMPEL

I, David E. Gottlieb, an attorney at law, duly licensed to practice law before the Courts of the State of New York, hereby declare the following statements under penalties of perjury:

- 1. I am a Partner at the law firm Wigdor LLP, attorney for Plaintiff Rinat Hafizov in the above-captioned matter. This Declaration is submitted in connection with Plaintiff's Reply Memorandum of Law in Further Support of his Motion to Compel.
- 2. Attached hereto as **Exhibit A** is a true and accurate copy of the Affidavit of Andrew Greiner.
 - I declare that the foregoing is true and correct under penalties of perjury. 3.

Dated: July 13, 2023

New York, New York